

ESTTA Tracking number: **ESTTA678335**

Filing date: **06/16/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91191251
Party	Plaintiff Excelled Sheepskin & Leather Coat Corp.
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Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Michael A. Grow
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Date	06/16/2015
Attachments	Excelled-RML.pdf(118683 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

EXCELLED SHEEPSKIN & LEATHER COAT CORP. :

Opposer :

v. : Opp. No. 91191251

RML JACKSON, LLC :

Applicant :

**PETITIONER'S MOTION FOR SUSPENSION
WITH CONSENT**

Opposer Excelled Sheepskin & Leather Coat Corp., with the consent of Applicant, RML Jackson, LLC, hereby moves that the suspension of the above referenced proceeding be continued to and including August 16, 2015, and that all dates be extended as follows:

Discovery Period to Close :	10/15/2015
Opposer's Pretrial Disclosures :	11/29/2015
Opposer's 30 day Trial Period Ends :	01/13/2016
Applicant's Pretrial Disclosures :	01/28/2016
Applicant's 30 day Trial Period ends :	03/13/2016
Opposer's Rebuttal Disclosures :	03/28/2016
Opposer's 15 day Rebuttal Period Ends :	04/27/2016

Both parties wish to continue the suspension of this matter, and both remain committed to continuing to negotiate a final settlement. The parties have deferred the taking of discovery so that they can continue to consider settlement without incurring unnecessary expense. The parties have met personally and considered various proposals.

In an email dated November 7, 2014, Applicant's counsel confirmed that Applicant is discussing this matter internally. On December 18, 2014, counsel for the parties participated in a

telephone conference concerning the status of settlement discussions. Opposer's counsel and Applicant's counsel had further email discussions on February 17, 2015, regarding the status of the negotiations. Counsel for the parties spoke at some length by telephone on April 20, 2015, and reiterated their clients' preference to find an amicable resolution of this matter. Counsel agreed to communicate with their clients, and to follow up with each other again, within the next few weeks.

Additional time is needed to enable the parties to continue their discussions in an orderly manner. Accordingly, the parties strongly prefer to continue to defer taking discovery in this proceeding so as to avoid unnecessary expenditure of resources and counter-productive adversarial activities.

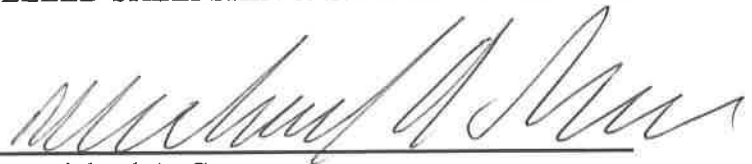
Because of the complexity of issues unrelated to the merits of this proceeding (some of which are highly confidential), the parties are unable to determine a firm timetable for resolution.

Applicant's counsel has consented to the granting of this suspension.

The parties have held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2).

EXCELLED SHEEPSKIN & LEATHER COAT CORP.

By



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CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing has been served upon Applicant's counsel Kate Starshak of K&L Gates LLP, by email upon agreement at kate.starshak@klgates.com on June 16, 2015.

A handwritten signature in dark ink, appearing to be "Michael J. Kim", is written over a horizontal line.